NPDES INSPECTION REPORT

WASTEWATER TREATMENT FACILITY PARMA, IDAHO

INSPECTION DATE: June 6, 2012 REPORT DATE: June 20, 2012

Prepared By:
Michael Spomer
Technical Services
Idaho Department of Environmental Quality

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Unless otherwise noted, all details in this inspection report were obtained from conversations with Mr. Kevin Steinhaus, City of Parma Public Works Supervisor, on June 6, 2012.

I. Facility Information

Facility Name: City of Parma, ID Wastewater Treatment plant

Facility Type: Sewage Treatment Plant

Facility Location: 406 E. South St.

Parma, ID 83660 Latitude: 43° 47' 20" N Longitude: 116° 57' 30" W

Mailing Address: 305 N. 3rd Street

P. O. Box 608 Parma, ID 83660

Facility Contacts: Kenneth Steinhaus, Public Works Supervisor

Facility Numbers: Ph: (208) 722-6088

Fax: (208) 722-5139

Permit Number: ID002177-6

Permit Status: Permit became effective on May 1, 2004 and expired on

April 30, 2009. A Permit re-application was received by EPA on April

24, 2009 and the permit is administratively continued.

SIC Code: 4952

II. Inspection Information

Inspection Date/Time: June 6, 2012 9:00 a.m. to 12:30 p.m.

Inspectors: Mike Spomer (Idaho Department of Environmental Quality)

AJ Maupin, P.E. (Idaho Department of Environmental Quality) Kevin Ryan, P.E. (Idaho Department of Environmental Quality)

Weather: Clear skies and sunny

Purpose: Determination of Compliance with the NPDES Permit and the Clean

Water Act.

City of Parma Inspection Report June, 2012 Page 3

III. Inspection Entry

I initially contacted Mr. Steinhaus on May 15, 2012 to schedule the date of May 23, 2012 for an inspection. However, on May 20, 2012, Mr. Steinhaus requested the inspection be delayed until June 6, 2012, due to several critical issues within the City of Parma that needed his attention. A new date of June 6, 2012 was set for the inspection.

On June 6, 2012, the inspectors arrived at the City of Parma Public Works office at approximately 8:58 a.m. and met with Mr. Steinhaus. I presented my credentials to Mr. Steinhaus and explained the purpose of the visit prior to the start of the inspection. I also introduced Mr. Maupin and Mr. Ryan, with Idaho Department of Environmental Quality. Mr. Maupin is a credential NPDES inspector, and Mr. Ryan is participating as a trainee to become a credentialed NPDES inspector.

IV. Inspection Chronology

The June 6, 2012 Inspection began with an opening conference where I discussed the specific areas that I would be reviewing during the inspection. Mr. Steinhaus was asked to describe the City of Parma's wastewater flows and treatment process. After his presentation, I requested to review his Discharge Monitoring Reports (DMRs) and wastewater sampling records on file for the period January 2011 through May 2012. Mr. Steinhaus retains the files at the shop where his office is located. Following the file review, we proceeded to drive out to the treatment pond site and conduct the field portion of the inspection. Mr. Steinhaus accompanied us throughout the inspection.

After the treatment area inspection, we returned to the office where the closing conference took place and where I summarized the areas of concern that were observed throughout the inspection.

We left Mr. Steinhaus's office at 11:48 p.m.

V. Owner and Operator Information

The Facility is owned and operated by the City of Parma, Idaho (City).

The current Mayor of the City of Parma at the time of the inspection was the Honorable Mayor Craig Telford.

VI. Background

The NPDES permit authorizes the Facility to discharge to the Sandhollow Creek via Outfall No. 001, Latitude: 43° 47' 12.5"N, Longitude: 116° 57' 34.4"W. According to Mr. Steinhaus, the City's wastewater plant discharges up to 150,000 gallons per day of treated wastewater. Mr. Steinhaus did indicate that the older section of the City of Parma has a significant issue with storm water infiltration into the sanitary sewer. During high precipitation events, there is a large increase recorded in the flow to the primary treatment lagoon. He did indicate that the large primary lagoon has enough capacity to handle the surge and not disturb the treatment system operations.

VII. Waste Management Process

Current Waste Management:

The City of Parma collects the sanitary waste in underground sewers through the city, and there is a single lift station (with two electric pumps and one standby, gas-operated pump) that lifts the wastewater to the Lagoon Treatment System.

The Lagoon Treatment System consists of three (3) lagoons operating in series. The outlet of the third lagoon is pumped to one of four (4) rapid infiltration basins that operate like sand filters. The RI basins are routinely alternated to balance the loading to the basins. The RI basins are equipped with an Underdrain Collection System that collects the filtered effluent and delivers it to a lift station. The lift station discharges the wastewater to a chlorine (gas) disinfection system, prior to discharging the treated wastewater through a single outlet pipe into the Sandhollow Creek. No dechlorination system is used prior to the discharge.

The wastewater from the influent lift station passes through a bar screen and is metered prior to discharging into the primary lagoon. The primary lagoon has four (4) floating aerators placed around the primary lagoon to help aerate the pond. The primary lagoon water then flows into Lagoon #2 that is equipped with a single floating aerator. Lagoon #2 is equalized with Lagoon #3. Lagoon #3 overflowed into a wet well where the wastewater is pumped to the RI basins. The flow to the RI basins is metered. The facility operators rotate which RI basin will receive water and manually open the inlet to that basin. The operator tries to limit the level in the RI basin to no more than several inches of water at a time. The wastewater from the RI basin seeps through the bed and is collected in an underdrain system which discharges to another lift station prior to disinfection.

The lift station post RI basin collects and pumps the filtered effluent through a chlorine disinfection system. The required disinfection contact time is obtained while the chlorinated effluent passes through a serpentine piping system. The flow through the chlorine contact chamber is metered. After the chlorine contact chamber, the treated wastewater is discharged to through a single discharge point into the Sandhollow Creek.

The lagoons were seepage tested in 2009 and 2010, and they successfully passed.

In 2007, the City of Parma removed sludge from Lagoon #3. They utilized "Geo Bags" to retain the solids and remove the water. The biosolids were tested and disposed of in the City of Payette municipal landfill. The sludge levels in Lagoon #1 and #2 have been measured and did not show any significant buildup of solids.

Future Waste Management:

Mr. Steinhaus indicated there were no immediate plans to upgrade the Wastewater Treatment System other than to begin to address the storm water infiltration problem. He indicated that he has discussed with the City Council the need to fund system upgrades to meet future phosphorus standards

VIII. Facility Sample Collection and Analyses

The sample collection and analyses duties are conducted either by Mr. Steinhaus or other

trained Public Works staff. The Mayor, Craig Telford, signs off on the DMRs prior to submitting them to EPA. During the review of the DMR records, it was noted that the form listed the former Mayor (Ms. Margaret Watson) as the signatory for the permittee.

The Facility analyzes the following parameters at their workstation located in the Chlorine Disinfection Building: flow, pH, total residual chlorine (TRC), and temperature. The other monthly grab effluent samples are collected by City of Parma staff and picked up and tested by Analytical Laboratories, Inc. in Boise, Idaho. Analytical Labs analyzes the following parameter: biological oxygen demand (BOD₅), total suspended solids (TSS), oxygen, *Escherichia coli* (E. coli), total phosphorus (as P), and total Ammonia (as N).

Surface water samples are collected quarterly by the City of Parma staff and tested by Analytical Labs for the following parameters: pH, temperature, dissolved oxygen (DO), total phosphorus (as P), and total Ammonia (as N).

IX. Areas of Concern

The inspection included a review of the current treatment system, file and document review for chain of custody, sample analyses, and DMR review. During the course of the inspection, I observed and identified the following areas of concern:

A. Effluent Limitations and Monitoring Requirements:

On February 29, 2012, the City of Parma was notified by Analytical Labs that there was violation for E. Coli bacteria for the sample collected on February 22, 2012. The City of Parma immediately notified the NPDES Compliance Hotline within 24 hours as required by Permit Condition Part II Section G.1. The City of Parma took the precautionary step of increasing the chlorine residual in the effluent and re-sampled. The City of Parma submitted a written notice on March 2, 2012 and a follow-up letter on March 16, 2012, with additional data showing the facility was back to compliance by February 27, 2012. The E. Coli bacterial level had dropped from 820 MPN/100 ml in the February 22, 2012 sample to 96 MPN/100ml in the February 27, 2012 sample, which was taken before the City received word on the February 22, 2012 results. The apparent cause of the single high event was possible cross contamination of samples taken on February 22, 2012. My concern is that the City of Parma exceeded the instantaneous maximum limit for E. Coli bacteria, as recorded on the submitted DMR for the month of February 2012.

B. Operations and Maintenance Plan:

Part I Section C of the permit states: "In addition to the requirements specified in Section III. E. of the permit (Proper Operations and Maintenance), by November 1, 2004, the permitee shall develop and implement an operations and maintenance plan for the wastewater treatment facility. The plan shall be retained on site and available on request to EPA and DEQ." The only Operations and Maintenance Plan the City of Parma was able to provide was dated 1985. My concern is that the City of Parma has not complied with the requirements of Part I Section C of the permit.

C. Quality Assurance Plan (QAP):

Part I Section D of the permit states: "the permittee must develop a Quality Assurance Plan for all monitoring required by the permit." The plan must be developed and implemented by November 1, 2004. During the inspection, the only available copy of a QAP was found in the Chlorination Building at the treatment site. The copy available was dated September 2008, was watermarked as a draft, and was not signed or approved by anyone. In addition, Part I Section D.5. states: "Copies of the QAP must be kept on site." Mr. Steinhaus contacted DEQ the following week informing the inspectors that he had located the signed copy of the QAP. A.J. Maupin, P.E., revisited the city office and the Chlorination Building on June 21, 2012 to verify that official QAPs were resident in these city locations. My concern is that the City of Parma was not able to produce a true, accurate, and complete Quality Assurance Plan, as required under Part I Section D of the permit at the time of the inspection.

D. Additional Concerns:

- 1. During the office review of the analytical data in the DMR reports, and as observed during field inspection of the on-site lab located in the Chlorination Building, Mr. Steinhaus informed the inspectors that the field notes and log sheets dating back to at least January 2011 had been mistakenly placed in the trash and lost. At a minimum, the analytical data for total residual chlorine values and pH values recorded on the DMRs has not been retained by the City. Part II Section F of the permit states: "the permittee must retain records of all monitoring information." My concern is that the permittee has not retained the required monitoring records for the period January 2011 through May 2012.
- 2. During the field inspection of the on-site lab testing equipment located in the Chlorination Building, the pH 7 buffer reagent used by the City to calibrate the pH meter had an expiration date of May 2011. Section I D. 2. states: "the permittee must use the EPA-approved QA/QC and chain of custody procedures." My concern is that the May 2011 through May 2012 Monthly DMR may not be true, accurate, and complete.
- 3. During the field inspection of the on-site lab testing equipment located in the Chlorination Building, the Lab SOP Manual contained the procedure for calibration of the old pH meter. The SOP had not been updated to include the calibration procedure for new pH meter currently being used by the City. Section I D. 2. states: "the permitee must use the EPA-approved QA/QC and chain of custody procedures."
- 4. During the field inspection of the on-site lab testing equipment located in the Chlorination Building, the meter used by the City to measure the temperature of the effluent did not have a calibration sticker on it to indicate the meter was accurately calibrated. In addition, Section I D. 2. states: "the permitee must use the EPA-approved QA/QC and chain of custody procedures." My concern is that at the least, the May 2012 Monthly DMR may not be true, accurate, and complete.
- 5. During the review of the sample collection performed by the City, the wastewater samples are held in a refrigerator, located in the shop, prior to being sent for analysis. The refrigerator was not equipped with a temperature measuring device to determine the samples are cooled to at least 6° C. Failure to properly control the temperature of the

collected samples could result in invalid lab analysis. Section I D. 2. states: "the permitee must use the EPA-approved QA/QC and chain of custody procedures." My concern is that at the least, the May 2012 Monthly DMR may not be true, accurate, and complete.

- 6. During the review of the 2011 and 2012 Monthly DMRs, the signatory on the documents was Mayor Craig Telford. However, the permitee name and address listed the Mayor as Margaret Watson. Mr. Steinhaus indicated that the current Mayor was in fact Mr. Telford. Mayor Telford has been in office since 2009. Under Part IV Section E. 3, Signatory Requirements, "If an authorization under Part IV.E.2 is no longer accurate because a different individual, a new authorization satisfying the requirements of Part IV.E.2 must be submitted to the Director and Idaho Department of Environmental Quality prior to or together with any reports" Mr. Steinhaus was not able to produce documentation that notification of the change in Mayors has been submitted to the agencies. My concern is that the City of Parma has not complied with Section IV.E.3 of the permit.
- 7. During the document review of the surface water quarterly sampling performed in 2012, Mr. Steinhaus was not able to produce a chain of custody for the samples collected in January 2012. In the draft QAP, the chain of custody is required to be filled out prior to sampling to the extent possible. In addition, Section I D. 2. states: "the permitee must use the EPA-approved QA/QC and chain of custody procedures." My concern is that the first quarter 2012 surface water monitoring results may not be true, accurate, and complete.

X. Inspection Sampling

Samples were not collected by DEQ at the time of this inspection on June 6, 2012.

Report Completion Date:

June 29, 2012

Lead Inspector Signature:

Michael Spomer
Technical Services
Idaho Department of Environmental Quality

ATTACHMENT A

Photograph Documentation

Wastewater Treatment Facility Parma, Idaho (June 6, 2012)

Name of Facility: City of Parma Wastewater Treatment Facility

Photographer: A.J. Maupin, PE

Inspection Date: 6/6/2012

Purpose of Inspection: 2012 NPDES Compliance Inspection

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Photograph 1. Looking out the entrance towards the east.

Facing east. Looking out the entrance to the lagoons.



Photograph 2. Sandhollow Creek.

Looking southeast from the lagoon dike towards Sandhollow Creek, the receiving surface water, at the point it enters the facility.



Photograph 3. East dike of Lagoon #1 looking towards influent discharge pipe.

Facing north northeast along Lagoon #1 eastern dike towards the lift station discharge. Notice the elbow is turned upwards to maintain elevation in the wet well.



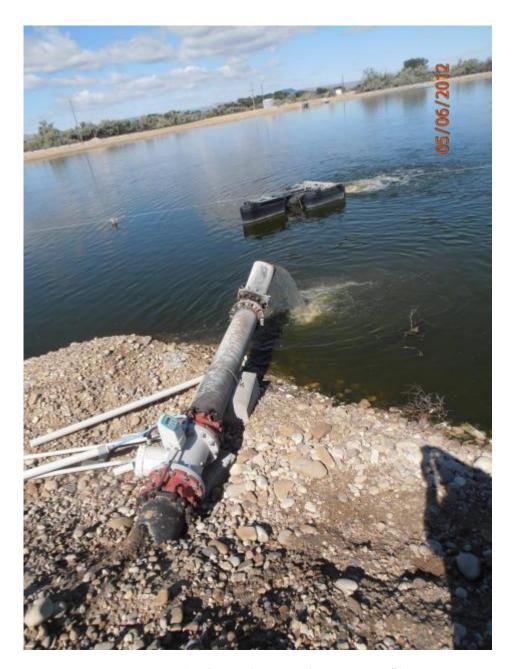
Photograph 4. Aerators in Lagoon #1.

Facing north northwest at an aerator in Lagoon #1.



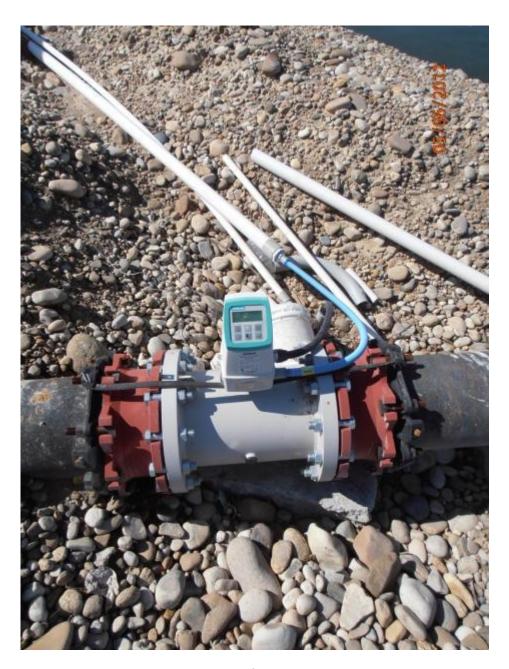
Photograph 5. Lagoon #1 and dike separating Lagoon #2.

Facing west down dike separating Lagoon #1 from Lagoon #2.



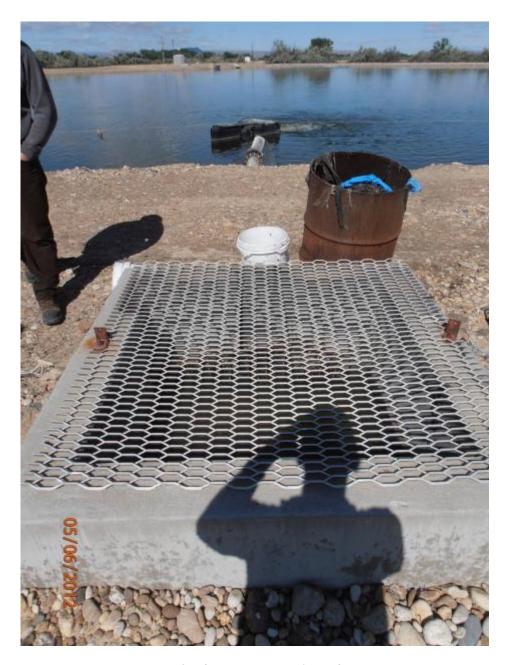
Photograph 6. Influent discharge pipe to Lagoon #1.

Influent discharge pipe. Upturned elbow maintains full pipe flow for proper flow meter operation.



Photograph 7. Influent Flow Meter.

Facing south. Lagoon #1 influent flow meter.



Photograph 8 Influent wet well prior to flow meter.

Facing west. Influent wet well prior to flow meter and discharge to Lagoon #1.



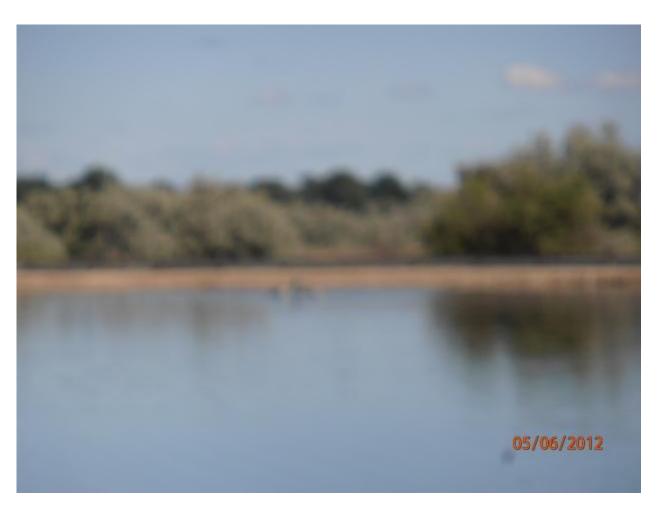
Photograph 9. Wet well, influent sampling point and equipment.

Facing south southwest. Wet well that recieves lift station effluent where influent samples are collected.



Photograph 10. 3 of Lagoon #1's 5 aerators.

Facing north on dike separating Lagoons #1 and #2 at the eastern string of aerators.



Photograph 11. Telephoto picture of Lagoon #1's aerator.

Facing northwest across Lagoon #1 at an aerator on the far side.



Photograph 12. Valvebox controlling flow from Lagoon #1 to Lagoon #2.

Facing west near entrance to lagoons. Valve box that controls flows to Lagoon #2.



Photograph 13. Aerator in Lagoon #2.

Facing southwest towards Lagoon #2's aerator, and lagoon's southern dike. Sandhollow Creek is immediately on the far side of this dike.



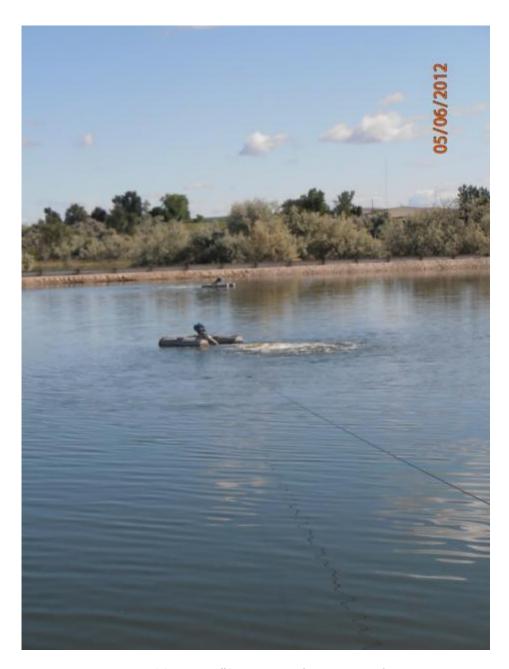
Photograph 14. Aerator motor control house and flat bottomed boat.

Facing north at lagoon entrance at the Motor Control Building and service boat.



Photograph 15. Lagoon #3 discharge point back to Lagoon #2.

Facing south southeast with Lagoon #1 in background. Lagoon #3 is immediately to the right. This is the discharge into Lagoon #1 from Lagoon #3, used when effluent quality is not good enough to send to sand filters, disinfection, and discharge.



Photograph 16. Lagoon #1 aerators at far west end of lagoon.

Facing north northeast at the final 2 of 5 aerators in Lagoon #1. System only requires 4 aerators, but they have 5 providing 1 aerator as backup.



Photograph 17. Lagoon #3, showing dike separating Lagoon #2 in the background.

Facing southeast. Lagoon #3 and its re-route control structure on the right-hand side of photo.



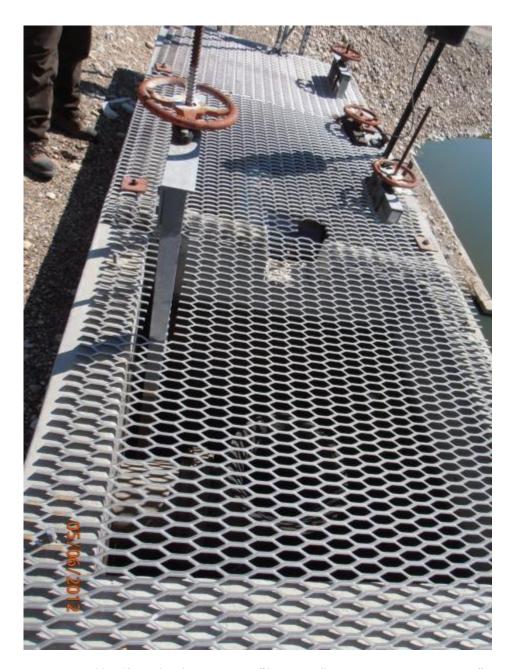
Photograph 18. Pump Control Building and lift station head works at terminal end of Lagoon #3.

Facing south. The head works can direct the flow from Lagoon #3 either to the next unit process, sand filters, or back to Lagoon #1.



Photograph 19. Flow meter well.

Well is located about 25 feet north of the Motor Control Building and 15 feet west of Lagoon #3's discharge head works.



Photograph 20. Lift station from Lagoon #3 to sand filters, or return to Lagoon #1.

Facing northeast. Lagoon #3 on right. Lagoon #3 re-route to Lagoon #1 entrance visible below grating. Lift station pumps to sand filter located in wet well at top of photo.



Photograph 21. Lagoon #3 in foreground, Lagoon #2 in background, and Lagoon #1 on the left.

Facing south southeast. Lagoon #3 in foreground, Lagoon #2 in background, Lagoon #1 on the left, and Sandhollow Creek flows on far side of metal panel fencing below the Russian olive trees.



Photograph 22. Basin #1.

Facing north. Infiltration Basin #1 is the first basin encountered when traveling down the service road from Lagoon #3. Parma personnel refer to these infiltration basins as rapid infiltration basins, when a more appropriate descriptor would be an unlined sand filter. The basins do not have a liner, but they do have an Underdrain Collection System that routes filter effluent to the chlorination basin and final discharge point in Sandhollow Creek.



Photograph 23. Basin #2, due west of Basin #1.

Facing north.



Photograph 24. Basin #3, due west of Basin #2.

Facing north.



Photograph 25. Basin #4, due west of Basin #3.

Facing north.



Photograph 26. Capped pipe at northwest corner of Basin #4.

Facing north. Discharge pipe capped at northwest corner of infiltration basin.



Photograph 27. Chlorination contact chamber access.

Facing south. Manholes provide access to chlorine contact basin, composed of multiple \emptyset 48 inch pipes.



Photograph 28. East end of chlorine contact basin.

Facing east.



Photograph 29. Discharge point access and access manhole.

Facing southwest. Discharge point to Sandhollow Creek located through gate. Manhole provides access to discharge piping and is turning point for effluent flow from chlorination contact basin toward creek.



Photograph 30. Underdrain collection well and float controls.

Filtration basins' Underdrain Collection System discharges to this float-controlled wet well, which lifts effluent to Chlorination System.



Photograph 31. Wet well and weather station.

Facing south.



Photograph 32. Chlorination Building.

Facing east.



Photograph 33. Chlorine Injection System.



Photograph 34. Chlorine injector.



Photograph 35. Well head for site well. Well supplies water for chlorine injection.

Facing west towards water-filled gravel pit, which supplied materials to construct the infiltration basins.



Photograph 36. Well head and pump controls.

Room at southeast corner of Chlorination Building provides room to perform water quality tests that must be done immediately; temperature, pH, DO.



Photograph 37. pH meter and pH calibration solutions.

pH meter also monitors salinity/conductivity. Located in Chlorination Building's southeast corner.



Photograph 38. pH buffer solutions.

Acidic buffer solution expiration date is August 2014, neutral buffer solution is expired in May 2011, and basic buffer solution expiration date is July 2012.



Photograph 39. Overflow chart recorder.

Located in Chlorination Building's southeast room.



Photograph 40. Chlorine gas detector.

Located in Chlorination Building's southeast room.



Photograph 41. Wet well meter



Photograph 42. Discharge point to Sandhollow Creek.



Photograph 43. Discharge pipe and effluent discharge sample collection point.

Samples typically collected here except during high flow seasons. Collection during high flows are made at manhole access about 75 feet north of this point.



Photograph 44. Manhole immediately preceding discharge point.

Discharge samples collected here when discharge pipe is inundated by Sandhollow Creek.



Photograph 45. Pond resulting from gravel and sand extraction used to build infiltration basins.

Facing northwest. Pond is not part of Parma WWTF.



Photograph 46. Adjacent sand and gravel pond that supplied materials for infiltration basin construction.

Facing west northwest.

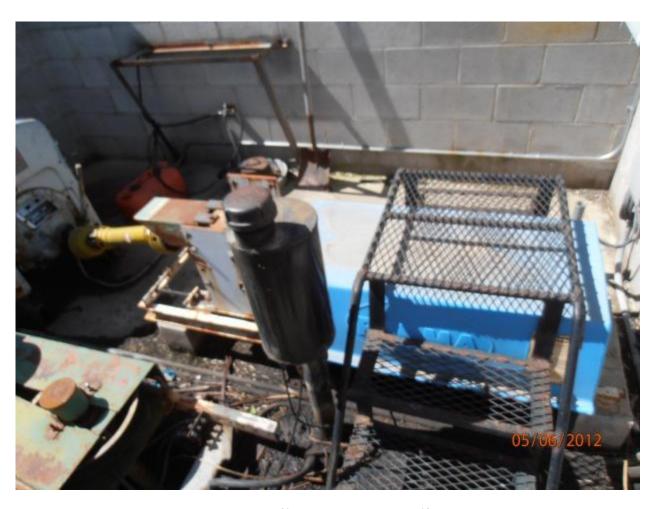


Photograph 47. Sand and gravel pond where materials for infiltration basin construction were obtained. $Facing\ west.$



Photograph 48. Wastewater lift station with backup pump engine.

Lift station that sends raw wastewater to Lagoon #1. Lift station is located about 470 feet east of lagoon area gate.



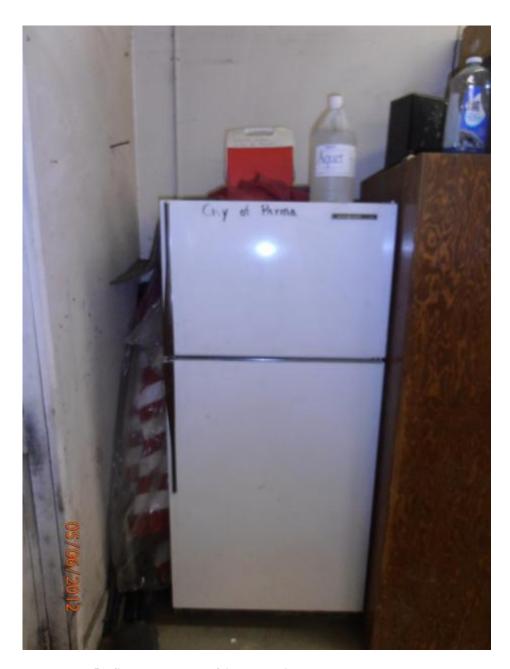
Photograph 49. Backup pump water lifter.

Water lift brand pump attached to backup engine.



Photograph 50. Upstream sample extraction point in Sandhollow Creek.

Sampling location from bridge located approximately 75 feet west southwest of lift station.



Photograph 51. Sample storage refrigerator with wastewater sample cooler on top.

Refrigerator is located in the back of the City Shop Building. The refigerator does not have a thermometer in it.



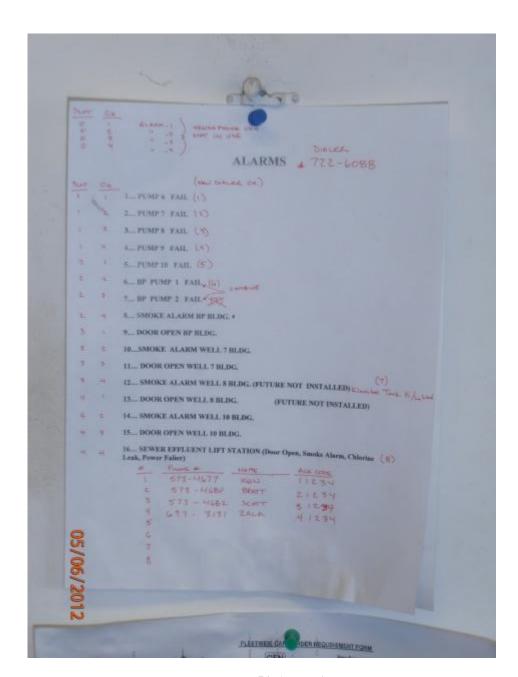
Photograph 52. Screen shot of SCADA System.

Located in the back of the City Shop Building.



Photograph 53. Auto dialer.

Located in City Shop Building adjacent to SCADA System.

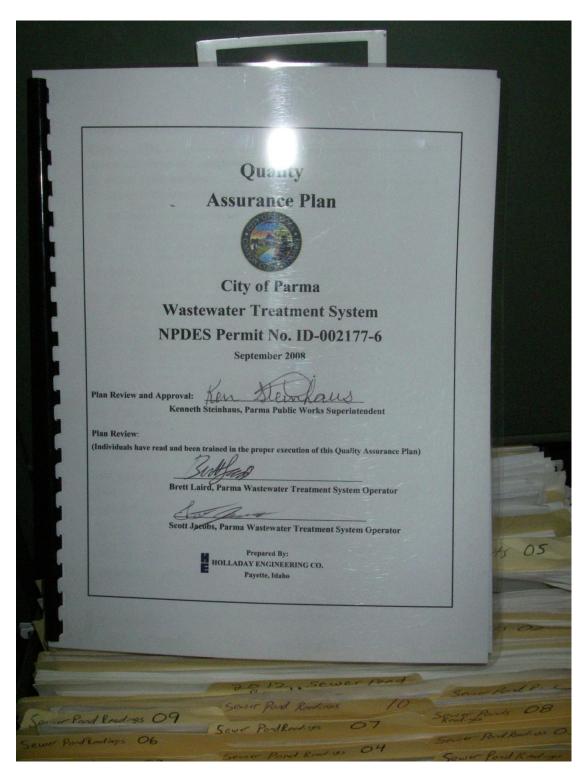


Photograph 54. Alarm list.

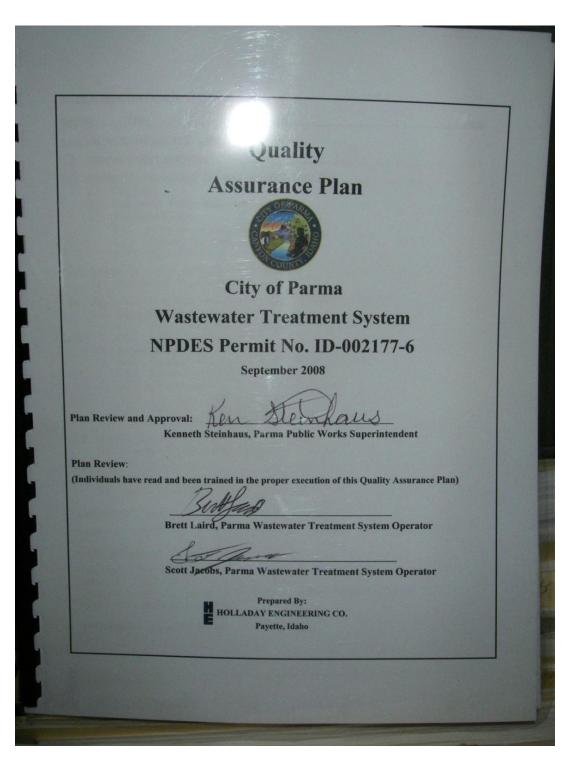
Alarm list is posted on the wall adjacent to the auto dialer.



Photograph 55. Auto dialer and alarm list.



Photograph 56. QAP, dated September 2008, in Office filing cabinet. Picture taken on 21 June 2012 during follow up visit after Parma notified DEQ inspectors that they had found the official QAP.



Photograph 57. Close up of QAP, taken 21 June 2012, in office filing cabinet.



Photograph 58. Photograph of QAP copy kept in Chlorine Building lab room out at the wastewater treatment lagoons, taken on 21 June 2012.

ATTACHMENT B

Discharge Monitoring Report (DMR)

February 2012 Parma, Idaho (MAYOR) CRAIG TELFORD TO COMMENTS AND EXPLANATION OF ARMY VOLATIONS (Reference all attachments here)
MONITORING LOCATION "NP IS FOR EFFLUENT.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

See Comments

WKLY AVG

Page 1

(208)722-5138

2-29-12 AAAAAGGBA

grab GRAB

		NATIONAL	NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)	SCHARGE EI	OLLUTANT DISCHARGE ELIMINATION SYST DISCHARGE MONITORING REPORT (DMR)	TEM (NPDES)		25		CMB	Form Approved CMB No. 2040-0084
PERMITTEE NAME/ADDRESS (Analyde Fedility Name/Location if Different)	Fishilly Named ocation # D	Bernell									
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				MONITORING PERIOD	PERIOD			(SUBR 02)			
PARMA, ID 83660	6		WWWDDYYYY	777	MANDOMAN	7		External Outfall	all I		
ATTN: MARGARET WATSON, MAYOR	OR	FROM	02/01/2012	12 10	П	2				No Di	No Discharge
	100	- Contraction							-		
PARAMETER		QUANTI	QUANTITY OR LOADING		0	QUALITY OR CONCENTRATION	CENTRATION		贝克	OF AMALYSIS	TYPE
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800, 5-day, 20 deg. C	MEASUREMENT	ш			1	a)	1		2	1/20	
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Raw Sewage Influent	REQUIREMENT	-	*******	*****	******	Reg. Mon.	*****	J.Gm		Monthly	GRAB
Solids, total suspended	SAMPLE	u			-				4		

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11/09/2011

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